SES | Networks

November 6, 2017

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: SES Americom, Inc. and O3b Limited, Notice of *Ex Parte* Presentation *Use of Spectrum Bands Above 24 GHz For Mobile Radio Services, et al.*, GN Docket No. 14-177, IB Docket Nos. 15-256 & 97-95; RM-11664; WT Docket No. 10-112

Dear Ms. Dortch:

On November 3, 2017 Suzanne Malloy, Philippe Secher and Will Lewis met with representatives of the International Bureau ("IB"), Wireless Telecommunications Bureau ("WTB") and Office of Engineering and Technology ("OET"). The representatives included Julius Knapp, Michael Ha, Bahman Bhadipour, Barbara Pavon, Brian Butler, Ronald Repasi, Jamison Prime, and Nicholas Oros from OET; Jose Albuquerque, Chip Fleming, Alyssa Roberts, Diane Garfield, Jennifer Gilsenan, Tom Sullivan, Jim Schlichting and Kal Krautkramer from IB; and Charles Oliver, John Schauble, Joel Taubenblatt, Tim Hilfiger, Blaise Scinto, and Matthew Pearl from WTB.

The meetings focused on the draft Second Report and Order, Second Further Notice of Proposed Rulemaking, Order on Reconsideration, and Memorandum Opinion and Order ("Order") in the above-captioned proceeding. SES and O3b addressed issues of importance to both geostationary orbit and non-geostationary Fixed Satellite Service ("FSS") operators. The discussion centered on the issues involving the following bands: 24.25-24.45 and 24.75-25.25 GHz (the "24 GHz band"); 27.5-28.35 GHz (the "28 GHz band"); 37-38.6 GHz (the "37 GHz band"), 38.6-40 GHz (the "39 GHz band"); and the 47.2-50.2 GHz band (the "47 GHz band").

SES discussed the Commission's proposals for these bands in its draft order, including rules addressing co-location of earth stations. SES asked that the Commission consider adjustments to the numerical limit imposed on earth stations per county or PEA. SES also urged the Commission to not to include grandfathered earth stations in the population limits created by the Order.

SES also highlighted the role that current and next generation geostationary ("GSO") and non-geostationary ("NGSO") satellite systems will play in facilitating the deployment of mobile services in the U.S. The ability of these systems to meet the throughput demands of

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U.S. customers and end users in these underserved regions will depend on reliable access to spectrum in the bands discussed above. SES noted that O3b's NGSO system enables current generation mobile services and applications and is supporting the provision of mobile connectivity in Puerto Rico while local terrestrial networks are being rebuilt.[1]

Please contact me if you have questions about this submission.

Respectfully submitted,

SES Networks

/s/ Will Lewis
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[1] *See* O3b Limited, File No. SES-STA-20171011-01135 (granted Oct. 13, 2017); O3b Limited, File No. SES-STA-20171011-01141 (filed Oct. 17, 2017); SES Americom, Inc., File No. SES-STA-20171020-01188 (granted Oct. 24, 2017; SES Americom, Inc., File No. SES-STA-20171025-01206 (granted Oct. 27, 2017).

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